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May 5, 2022

Via ECF

Hon. Paul G. Gardephe, United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: USA v. Pierre (Andrew Prime)
22-Cr-19 (PGG)

Dear Judge Gardephe:

I represent Mr. Prime in the above Matter. I am submitting this letter motion for a temporary bail modification allowing Mr. Prime to travel to Los Angeles, CA for work purposes. Mr. Prime is a partner in an online retail store, and needs to be in Los Angeles in order to assist his partner with the business. He intends to travel to Los Angeles on May 14, and will return on May 21. Neither Pre-Trial nor the Government object to this request.

Thank you for your consideration in this matter.

Very truly yours,



David K. Bertan

DKB

cc: AUSAs Mathew Andrews and Louis Pellegrino (via ECF)